

ATTACHMENT G-2
DEFENDANT'S EXHIBIT LIST

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
GAINESVILLE DIVISION**

SANTANA BRYSON and JOSHUA
BRYSON, as Administrators of the
Estate of C.Z.B., and as surviving
parents of a deceased minor, C.Z.B.,

Plaintiffs,

v.

ROUGH COUNTRY, LLC,

Defendant.

Civil Action No.

2:22-CV-17-RWS

ATTACHMENT “G-2”

Defendant’s List of Documentary and Physical Evidence

No.	Description	Tendered	Admitted
1.	Exemplar Rough Country 4.5-inch lift kit		
2.	Videos and Photographs from RC’s inspection of the Ford F-250 Truck (RC 000153-208)		
3.	Official Report (Fannin DA 000478)		
4.	Georgia Motor Vehicle Crash Report (Fannin DA 000481-484)		
5.	Petition to Enter Plea of Guilty (Fannin DA 000542-552)		
6.	Georgia State Patrol Specialized Collision Reconstruction Team Report,		

	Case Number: SCRTB-017-20, dated 3/15/2020 (GSP SCRT 00466-660)		
7.	Photographs produced by GSP SCRT (GSP SCRT 00003-98)		
8.	Rough Country's 2016 Product Guide (RC000252-000283)		
9.	Documents produced by Ronnie Thompson Ford (Ronnie Thompson Ford 00001-00030)		
10.	RC Buyer, Inc.'s Profit & Loss Statement, January 1 through December 31, 2021 and 2022 (RC-BRYSON 000466-CONFIDENTIAL <i>et seq.</i>)		
11.	ATTACHMENTS A through E – CONFIDENTIAL (RC-BRYSON 000467-CONFIDENTIAL <i>et seq.</i>)		
12.	Rough Country's federal Corporation Income Tax Return, 2020 (RC-BRYSON 005450-CONFIDENTIAL <i>et seq.</i>)		
13.	Order Confirmation for Will Holloway Purchase (RC-BRYSON 005377)		
14.	FMVSS 126 Testing on 2015 Ford F-150, Link Test Number: 506576, dated March-2016 (RC-BRYSON 005378-5417 CONFIDENTIAL)		
15.	Restraint Control Module Report for Plaintiffs' 2008 Ford Escape, dated April 10, 2023		

16.	FMVSS 126 Testing on 2021 Ford F-150, Link Test Number 106053-2-1, dated July-2021 (RC-BRYSON 008204-008238)		
17.	FMVSS 126 Testing on 2021 Ford F-150, Link Test Number 106053-1-1, dated July-2021 (RC-BRYSON 008239-008273)		
18.	RC Development Protocol (RC-BRYSON 008307-008308)		
19.	Eval of the Enhancing v2v Compatibility Agreement (Roche Deposition Exhibit 5)		
20.	Eval of the Enhancing v2v Compatibility Agreement (Roche Deposition Exhibit 5)		
21.	Eval of the Enhancing v2v Compatibility Agreement (Roche Deposition Exhibit 5)		
22.	Expert file of Jonathan Eisenstat, M.D. (Eisentstat Deposition Exhibit 2)		
23.	Photographs (Eisenstat Deposition Exhibit 5)		
24.	Expert Report for Single-Moving-Vehicle Crash Test, 2016 Ford F-250 into a 2008 Ford Escape, TEC2210759, May 15, 2023, including related photographs (by Charles Crosby, P.E.), with attachments, appendixes, and exhibits (Crosby Deposition Exhibit 118)		

25.	Video(s) of Single-Moving-Vehicle Crash Test, 2016 Ford F-250 into a 2008 Ford Escape (<i>see, e.g.</i> , 2210759_051523_Video.mov and .mp4)		
26.	The F-250 from the Single-Moving-Vehicle Crash Test		
27.	The Escape from the Single-Moving-Crash Test		
28.	Still Photographs from Single-Moving-Vehicle Crash Test, 2016 Ford F-250 into a 2008 Ford Escape (<i>see, e.g.</i> , 2201759_051523 Photos.pdf)		
29.	Expert file of Charles Crosby, P.E. (Data)		
30.	Email Exchange (Crosby Deposition Exhibit 121)		
31.	Vehicle Purchase Order (Crosby Deposition Exhibit 122)		
32.	Exponent Invoice (Crosby Deposition Exhibit 123)		
33.	Screen Shot (Crosby Deposition Exhibit 124)		
34.	Mecanica Scientific Services's Preliminary Analysis Report, Case Number: 22-3104, March 27, 2024 (by Wesley Grimes), with attachments, appendixes, and exhibits		
35.	Mecanica Scientific Services's Supplemental Report, Case Number 22-3104, November 26, 2024 (by		

	Wesley Grimes), with attachments, appendixes, and exhibits		
36.	Expert file of Wesley Grimes, including HVE data, photographs, digital scans (including FARO scans of exemplar F-250 and an exemplar Escape), screenshots of HVE/SIMON analysis, and visualizations of resulting data (heat map and 3-dimensional point cloud data)		
37.	Expert file of Wesley Grimes – Police Report folder		
38.	Expert file of Wesley Grimes – Analysis folder		
39.	Expert file of Wesley Grimes – Vehicle Specs folder		
40.	Expert file of Wesley Grimes – EDR Data folder		
41.	Expert file of Wesley Grimes – F250 Insp folder		
42.	Expert file of Wesley Grimes – Escape Insp folder		
43.	Expert file of Wesley Grimes – Scene Insp folder		
44.	Expert file of Wesley Grimes – Testing folder		
45.	Expert file of Wesley Grimes – Test F250 folder		
46.	Expert file of Wesley Grimes – Test Escape folder		

47.	Expert file of Wesley Grimes – Exemplar Escape folder		
48.	Expert file of Wesley Grimes – Other Experts folder		
49.	Expert file of Wesley Grimes – FaroScans folder		
50.	Expert file of Wesley Grimes – HVE Runs		
51.	Expert file of Wesley Grimes – Photographs		
52.	Expert file of Wesley Grimes – Interior Images Test Escape		
53.	Expert file of Wesley Grimes – Scale Models		
54.	Expert file of Wesley Grimes – Supplemental Scans		
55.	CDR Reports from Mr. Elliott’s Ford F-250 and test F-250		
56.	Miniature model for Ford F-250		
57.	Miniature model of Ford Escape		
58.	BRC’s Report, dated March 29, 2024, , with attachments, appendixes, or exhibits (if any)		
59.	Preliminary Imaging Report, dated March 22, 2204 (produced by Rough Country in connection with BRC’s Report; Gwin Deposition Exhibit 27)		
60.	Photographs and radiological images of C.Z.B. post-mortem		

61.	Photographs taken of exemplar child safety seat (<i>see, e.g., _MG_003.jpg et seq.</i>)		
62.	Exemplar child seat (Safety 1st Grow and Go Sprint All-in-1 Convertible Car Seat, Silver Lake)		
63.	Expert file of Lisa P. Gwin, D.O., B.S.E.E., including photographs.		
64.	Materials Reviewed by Lisa P. Gwin (<i>see</i> Gwin Deposition Exhibit 17)		
65.	Photographs (Gwin Deposition Exhibit 26)		
66.	Images (Gwin Deposition Exhibit 28)		
67.	Notes (Gwin Deposition Exhibit 29)		
68.	Graphics (Gwin Deposition Exhibit 30)		
69.	Photograph ((Gwin Deposition Exhibit 32)		
70.	Photograph (Gwin Deposition Exhibit 37)		
71.	Photograph (Gwin Deposition Exhibit 38)		
72.	Photograph (Gwin Deposition Exhibit 39)		
73.	Photograph (Gwin Deposition Exhibit 40)		
74.	Photograph (Gwin Deposition Exhibit 41)		
75.	Photograph (Gwin Deposition Exhibit 42)		

76.	Photograph (Gwin Deposition Exhibit 43)		
77.	Photograph (Gwin Deposition Exhibit 44)		
78.	Photograph (Gwin Deposition Exhibit 45)		
79.	Photograph (Gwin Deposition Exhibit 46)		
80.	Tandy Engineering & Associates, Inc.'s Report, March 29, 2024, , with attachments, appendixes, or exhibits (if any)		
81.	Expert file of Robert J. Pascarella		
82.	Plaintiffs' Discovery Responses		
83.	Pleadings, Discovery Responses, and Expert Reports/Materials from <i>Bacho</i> suit (subject to motion <i>in limine</i>)		
84.	Pleadings, Discovery Responses, and Expert Reports/Materials from <i>Mendoza</i> suit (subject to motion <i>in limine</i>)		

- A. Rough Country reserves the right to use demonstrative exhibits at trial.
- B. Rough Country reserves the right to offer any exhibit listed by Plaintiffs.
- C. Rough Country reserves the right to enlarge any exhibit or excerpt therefrom necessary for demonstrative purposes at trial.
- D. Rough Country reserves the right to use any relevant standards, codes, or regulations.
- E. Rough Country reserves the right to use any exhibit necessary for cross-examination.

- F. Rough Country reserves the right to use any exhibit necessary for rebuttal or impeachment.
- G. Rough Country reserves the right to use any document attached as an exhibit to pleadings filed in this case.
- H. Rough Country reserves the right to use any and all depositions taken or to be taken.
- I. Rough Country reserves the right to use any exhibit attached to depositions of any witnesses deposed in this case.
- J. Rough Country reserves the right to use any and all videotaped depositions taken or to be taken.
- K. Rough Country reserves the right to use any and all documents requested but not yet produced.
- L. Rough Country does not agree to the admissibility of all exhibits simply by inclusion on this list, and Rough Country reserves the right for objection and some exhibits are listed subject to forthcoming motions *in limine*.